

From: "DAUGHERTY Katie * DEQ" <Katie.DAUGHERTY@state.or.us>
To: "Novak, Madi" <Novak.Elisabeth@epa.gov>
Date: 3/3/2021 8:06:40 AM
Subject: FW: Arkema - quick question
Attachments: [Katie Daugherty R G .vcf](#)

Hi Madi,

We are working with ERM to figure out the logistics of the upcoming quarterly gw sampling event which will include both upland and in water related sampling. I would like to confirm that the in water related data is expected to be submitted to EPA through a QPR as ERM indicates below. Is this a document that EPA will share with DEQ? DEQ would like to see all the upland gw data and while they are going to provide the lab reports for in water related gw sampling to DEQ, it would be a lot more efficient to review to also have the associated tables and figures that I would hope are part of the QPR submitted to DEQ. Please let me know.

Thank you,
Katie Daugherty, R.G.
Project Manager
NWR Cleanup and Tank Program
Department of Environmental Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232
Phone: 503-229-6748
Please note new email: Katie.Daugherty@deq.state.or.us

From: Sarah Seekins <Sarah.Seekins@erm.com>
Sent: Tuesday, March 2, 2021 4:49 PM
To: DAUGHERTY Katie <Katie.DAUGHERTY@state.or.us>; henning.larsen@state.or.us
Cc: Brendan Robinson <Brendan.Robinson@erm.com>; Josh Hancock <Josh.Hancock@erm.com>; Todd SLATER <todd.slater@total.com>
Subject: RE: Arkema - Upland Meeting 2/23

Hi Katie -

We had a call with Integral today to further discuss the logistics of the upcoming combined monitoring event. Can you confirm whether it would be acceptable for the laboratory analytical reports to include **all data** collected during the event?

Under this procedure, data specific to performance monitoring would be presented in the the QPR and subsequent monitoring report submitted to DEQ. The additional data will not be included in figures or tables however, back end laboratory reports would include the additional data collected under the EPA consent order. We would include a caveat that all data collected under the EPA consent order will be reported under the associated QPR to be submitted by Integral.

We'd appreciate it if you could let us know if this would be acceptable as soon as possible so that we can prepare for data management and reporting efforts accordingly.

Thanks,

Sarah

Sarah Seekins
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From: Sarah Seekins

Sent: Friday, February 26, 2021 1:52 PM

To: 'DAUGHERTY Katie' <Katie.DAUGHERTY@state.or.us>; 'henning.larsen@state.or.us' <henning.larsen@state.or.us>

Cc: Brendan Robinson <Brendan.Robinson@erm.com>; Josh Hancock <Josh.Hancock@erm.com>; Todd SLATER <todd.slater@total.com>

Subject: Arkema - Upland Meeting 2/23

Katie and Henning,

Thank you for taking the time to meet with us on Wednesday to discuss the Arkema project. Please find a brief summary of our understanding of this discussion and next steps below:

□ **Q1 2021 Groundwater Performance Monitoring**

- Performance monitoring program will extend into April 2021 to coincide with In-Water PDI Workplan Sampling (i.e. samples for Q1 will be collected in March and April 2021).
- ERM and Integral are currently working to define schedule for sampling and will communicate to DEQ when final
- We propose that the QPR and subsequent monitoring report to DEQ will include **performance monitoring data only**. All additional data collected under the EPA consent order will be reported under the associated QPR to be submitted by Integral. This report will be submitted to the EPA on the 15th of the month the following the quarter.

□ **2020 Annual Monitoring Report**

- ERM presented overall approach to the statistical data evaluation. This approach includes an order of magnitude comparison of historic (2007 and 2010) and current (Q4 2019 through Q4 2020) groundwater concentrations as well as a Mann Kendall trend assessment of groundwater concentrations to date. The data has been evaluated both horizontally (location relative to barrier) and vertically (by aquifer). February 2019 data has been excluded from this evaluation as DEQ has indicated that this data has not been acknowledged for project use (*DEQ's Final Positions on Dispute Issues Regarding – Revised Upland Feasibility Study Work Plan for Arkema Site* dated 3/25/19).
- A draft Table of Contents for the report is attached for review and consideration – DEQ to notify ERM of additions/modifications as soon as possible
- ERM intends to submit the report to DEQ on **Friday (3/12)**.

Best,
Sarah and Team

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